

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(NEWARK VICINAGE)

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JEAN MICHAEL MECHIN,

Plaintiffs,

**Civil Action No.: 07-5824  
(SDW)(ES)**

-against-

CARQUEST CORPORATION; CARQUEST  
PRODUCTS, INC.; TMC ENTERPRISES;  
VOLTEC INDUSTRIES; TASCO; BWP  
DISTRIBUTORS, INC.; and ABC  
CORPORATIONS 1-10 (said names presently  
unknown and fictitious),

**CERTIFICATION OF SCOTT  
HAWORTH IN SUPPORT OF  
DEFENDANTS' MOTION TO  
PRECLUDE THE TESTIMONY  
OF PLAINTIFF'S EXPERTS  
ROBERT MALANGA, P.E., SAM  
GLUCKSBERG, PH.D., AND  
JOHN TOBIAS, PH.D., P.E.**

Defendants.

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Scott Haworth, under penalty of perjury, affirms as follows:

1. I am an attorney at law, duly licensed to practice in the State of New Jersey, and a Member of Haworth Coleman & Gerstman, LLC, attorneys for defendant, Voltec Industries, LLC ("Voltec"). I am fully familiar with all matters set forth herein.

2. This Certification is submitted in support of defendants, Tasco, TMC Enterprises, Voltec Industries, LLC, Carquest Corporation, Carquest Products, Inc. and BWP Distributors, Inc.'s, joint motion to preclude the testimony of plaintiff's

experts Robert Malanga, P.E., Sam Glucksberg, Ph.D., and John Tobias, Ph.D., P.E.

3. Defendants respectfully refer the Court to the arguments set forth in defendants' Brief in Support.

4. In support of defendants' motion to preclude plaintiff's experts from testifying at trial, defendants rely on the following exhibits:

- **Exhibit A** – Report of Robert Malanga, P.E., dated November 23, 2010;
- **Exhibit B** – Affidavit of Donald Hoffmann, Ph.D., P.E., C.F.I.;
- **Exhibit C** – Deposition Transcript of Robert Malanga, P.E.;
- **Exhibit D** – Deposition Transcript of Donald Hoffmann, Ph.D., P.E., C.F.I.;
- **Exhibit E** – Report of John Tobias, Ph.D., P.E. dated November 23, 2010;
- **Exhibit F** – Report of John Tobias, Ph.D., P.E. dated January 31, 2011;
- **Exhibit G** – Deposition Transcript of John Tobias, Ph.D., P.E.;
- **Exhibit H** – Report of Sam Glucksberg, Ph.D.;
- **Exhibit I** – Deposition Transcript of Sam Glucksberg, Ph.D.;
- **Exhibit J** – Curriculum Vitae of Sam Glucksberg, Ph.D.

5. Based on the arguments set forth in defendants' Brief in Support and the accompanying exhibits, defendants' motion to preclude the testimony at trial of

plaintiff's experts Robert Malanga, P.E., John Tobias, Ph.D., P.E., and Sam Glucksberg, Ph.D., should be granted in its entirety.

Dated: March 15, 2011



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Scott Haworth (SH 5890)  
Barry L. Gerstman (BG 3691)  
HAWORTH COLEMAN & GERSTMAN,  
LLC  
45 Broadway, 21st Floor  
New York, New York 10006  
Telephone: (212) 952-1100  
Attorneys for Defendant Voltec Industries,  
LLC

/s/ John Maucher  
John Maucher (JM 7892)  
MINTZER, SAROWITZ, ZERIS, LEDVA  
& MEYERS, LLP  
2070 Springdale Rd., Suite 400  
Cherry Hill, NJ 08003  
Telephone: (856) 616-0700  
Attorneys for Defendants Carquest Corp.,  
Carquest Products, Inc. and BWP  
Distributors, Inc.

/s/ Nicole Strauss-Russo

Nicole Strauss-Russo (NLS 1931)

LITCHFIELD CAVO LLP

*An Illinois Limited Liability Partnership*

1800 Chapel Avenue West, Suite 360

Cherry Hill, New Jersey 08002

Telephone: (856) 854-3636

Attorneys for Defendants, Tasco and TMC  
Enterprises